

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

David Henderson

Case No.

Case: 2:21-mj-30119 Assigned To :
 Unassigned Assign. Date : 3/11/2021
 Description: RE: SEALED MATTER
 (EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 18, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
 and/or by reliable electronic means.

Date: ~~March 10, 2021~~ March 11, 2021

City and state: Detroit, Michigan



Complainant's signature

Task Force Agent Angela R. Bunch, A.T.F.

Printed name and title



Judge's signature

Hon. David R. Grand, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Angela Bunch, being duly sworn, depose and state the following:

I. INTRODUCTION

1. I am a member of the Detroit Police Department and have been for twenty-two years. Since 2013, I have been assigned to the Firearms Investigative Team with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”). I became a Task Force Officer with the ATF in May of 2014. I have a Bachelors of Applied Science. I have been involved in numerous investigations related to violations of federal firearm and narcotic laws.

2. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the information known to law enforcement related to this investigation.

3. I am currently investigating David HENDERSON, date of birth xx/xx/1990, for being a felon in possession of a firearm, in violation of 18 U.S.C. § 922(g)(1).

4. I reviewed a computer printout of HENDERSON’s criminal history (“CCH”). HENDERSON has the following criminal record:

- a. 2017 - felony – delivery / manufacturing of a controlled substance, 16th Judicial Circuit Court, Macomb County; and

- b. September 28, 2020 – arraigned on one count of carrying a concealed weapon and one count of felon in possession of a firearm, 16th Judicial Circuit Court, Macomb County.

II. SUMMARY OF THE INVESTIGATION

5. On February 18, 2021, at approximately 11:00 p.m., Detroit police officers were on patrol around E. 7 Mile and Mt. Elliot, in the city of Detroit. They observed a black Dodge Durango traveling at a high rate of speed, while passing on the right. Officers initiated a traffic stop.

6. The driver, David HENDERSON, was unable to provide a valid driver's license. At this time, officers also observed a holster on the rear passenger seat. HENDERSON stated that the holster belonged to his brother, and that there were no weapons in the vehicle.

7. HENDERSON was asked to exit the vehicle and was arrested for driving without a valid license. An inventory search was conducted. A loaded handgun was found underneath the driver-side front window control panel. The firearm is a Smith & Wesson revolver, caliber .357, model 360PD, with ammunition.

8. HENDERSON sat in the rear of the police vehicle while one of the officers also sat in the rear seat completing paperwork related to the tow. Spontaneously, HENDERSON said, "I had a past incident dealing with a chick and some dude shot my car up." He later said, "you see these \$40,000 chains I got on,

that's the only reason I got that gun." The "chains" HENDERSON referred to were two pieces of jewelry.

9. I contacted ATF Special Agent Michael Jacobs, an expert in the Interstate Nexus of firearms. Agent Jacobs stated that the firearm, based on the description provided, without physically examining it, was manufactured outside the State of Michigan and therefore traveled in and affected interstate commerce.

10. Probable cause exists that HENDERSON is aware that he was a convicted felon at the time he possessed the firearm. At the time of this arrest, HENDERSON had been arraigned on a pending felon in possession of a firearm charge in the 16th Circuit Court, Macomb County. Additionally, he has two prior felony convictions from 2017.

III. CONCLUSION

11. Probable cause exists that David HENDERSON, a convicted felon, did knowingly and intentionally possess a firearm, which traveled in and affected interstate commerce, in violation of Title 18 U.S.C. § 922(g)(1).



Task Force Officer Angela R. Bunch
Bureau of Alcohol, Tobacco, Firearms and
Explosives

Sworn to before me and signed in my
Presence and/or by reliable electronic means.



HON. DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE

March 11, 2021